

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

MAGTEN ASSET MANAGEMENT CORP.  
and LAW DEBENTURE TRUST COMPANY  
OF NEW YORK,

Plaintiffs,

V.

NORTHWESTERN CORPORATION,

Defendant.

C.A. No. 04-1494-JJF  
(RE: D.I. 154)

MAGTEN ASSET MANAGEMENT CORP.,

Plaintiff,

V.

MIKE J. HANSON and ERNIE J. KINDT.

Defendants.

Civil Action No. 05-499-JJF  
RE: D.I. 188)

## NOTICE OF COMPLETION OF BRIEFING AND REQUEST FOR ORAL ARGUMENT

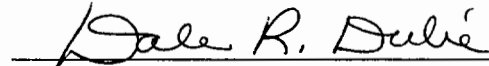
Plaintiff Magten Asset Management Corporation hereby provides notification that briefing was completed on May 11, 2007 on the Motion of Magten Asset Management Corporation for a Protective Order with Respect to the Deposition of Talton R. Embry (the "Motion").

Additionally, Plaintiff hereby requests oral argument on the Motion, pursuant to Local Rule 7.1.4.

Dated: Wilmington, Delaware  
May 11, 2007

Respectfully submitted,

**BLANK ROME LLP**

A handwritten signature in cursive script, reading "Dale R. Dubé", is written over a horizontal line.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 11<sup>th</sup> day of May, 2007, I served by hand delivery and electronic filing the NOTICE OF COMPLETION OF BRIEFING AND REQUEST FOR ORAL ARGUMENT, using CM/ECF which will send notification of such filing(s) to the following:

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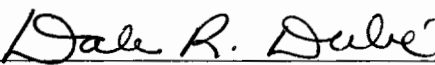
I also certify that, on this 11<sup>th</sup> day of May, 2007, I served the aforementioned document, by e-mail and Federal Express, upon the following participants:

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